

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

A.F., on behalf of J.F., and A.R., on behalf of
B.R.,

Plaintiffs,

v.

CHARACTER TECHNOLOGIES, INC.; NOAM
SHAZEER; DANIEL DE FRIETAS
ADIWARSANA; GOOGLE LLC; and
ALPHABET INC.,

Defendants.

Civil Case No. 2:24-cv-01014-JRG-RSP

**DECLARATION OF NOAM SHAZEER
IN SUPPORT OF MOTION TO DISMISS
FOR LACK OF PERSONAL
JURISDICTION**

1) My name is NOAM SHAZEER, and I am over 18 years of age and have personal knowledge of the facts contained herein.

2) I am resident of California.

3) I have never resided in Texas.

4) I do not conduct business in Texas, nor do I have an office in Texas.

5) I co-founded Character Technologies, Inc. From its founding in 2021 until my departure from Character Technologies, Inc. in 2024, Character Technologies, Inc. was headquartered in California and incorporated in Delaware.

6) I did not develop Character Technologies, Inc. in Texas.

7) In my role at Character Technologies, Inc., I did not provide services to or on behalf of Character Technologies, Inc. in Texas.

8) I did not enter into any business transaction or contract in Texas on behalf of Character Technologies, Inc.

9) I did not advertise or promote Character Technologies, Inc. in Texas.

10) I did not transact or solicit business in Texas on behalf of Character Technologies, Inc.

I declare under penalty of perjury under the laws of the United States that the above and foregoing is true and correct to the best of my knowledge and belief. Executed this 7th day of March, 2025.

DocuSigned by:

Noam Shazeer

F238B061609640C...

NOAM SHAZEER